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Linda T. Landis, Senior Counsel
Public Service Company of New Hampshire
780 North Commercial Street
Manchester, NH 03103

Dear Attorney Landis:

Normandeau Associates respectfully requests that PSNH seek an extension to the comment period for the draft NPDES Permit No. NH0001465 for Merrimack Station that was issued by the EPA on Friday, September 30, 2011. Normandeau's technical staff needs an extension due to several factors. This massive draft permit, developed by EPA over 14 years, was not discussed with our scientists prior to its issuance. The data set relating to the ecological health of the Merrimack River is extensive, accumulated over a 40+ year period. Scientists need significantly more time to review the data referenced in the draft permit, identify important information that was not used and to assess the validity of EPA's interpretation of data.

In addition, Normandeau's scientific lead investigator, Dr. Mark Mattson, has been subpoenaed to testify in Albany, New York beginning October 14th for a study he is involved in, and is not expected to return and be available until early November. His intimate knowledge of the Merrimack River near Merrimack Station is critical to our ability to analyze, evaluate and provide scientifically sound comments on this draft permit. Due to the length and scientifically dense nature of this draft permit, the vast data sets which relate to the ecological health of the river, and the fact that our most knowledgeable scientific expert is unavailable until early November, we respectfully request that the comment period be extended by 90 days. Please contact Dr. Mattson or me if you have any questions.

Sincerely,

Robert W. Varney
Executive Vice President

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